



FEDERAL ELECTION COMMISSION
Washington DC 20463

THIS IS THE BEGINNING OF ADMINISTRATIVE FINE CASE # 2815

DATE SCANNED 2/11/15

SCANNER NO. 2

SCAN OPERATOR SES



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

2014 SEP 12 PM 4:59

September 12, 2014

MEMORANDUM

SENSITIVE

TO: The Commission

THROUGH: Alec Palmer *AP* *PCO*
Staff Director

FROM: Patricia C. Orrock *PCO*
Chief Compliance Officer

Debbie Chacona *DC*
Assistant Staff Director
Reports Analysis Division

BY: Kristin D. Roser/Sari Pickerall *KDR* *SP*
Reports Analysis Division
Compliance Branch

SUBJECT: Reason To Believe Recommendation – 2014 July Quarterly Report for the
Administrative Fine Program

Attached is a list of political committees and their treasurers who failed to file the 2014 July Quarterly Report in accordance with 52 U.S.C. § 30104(a) (formerly 2 U.S.C. 434(a)). The 2014 July Quarterly Report was due on July 15, 2014.

The committees listed in the attached RTB Circulation Report either failed to file the report, no more than thirty (30) days after the due date (considered a late filed report), or filed the report more than thirty (30) days after the due

1-800-272-8802

1-800-272-8802

- 1-800-272-8802

Federal Election Commission
Reason to Believe Circulation Report
2014 JULY QUARTERLY Not Election Sensitive 07/15/2014 H_S_P_UNAUTH

| AF# | Committee ID | Committee Name | Candidate Name | Treasurer | Threshold | PV | Receipt Date | Days Late | LOA | RTB Penalty |
|------|--------------|--------------------------|--------------------|---------------|-------------|----|--------------|-----------|-----------------|-------------|
| 2815 | C00431056 | BOB CASEY FOR SENATE INC | CASEY, ROBERT P JR | CHARLES LYONS | \$1,412,155 | 0 | | Not Filed | \$282,431 (est) | \$9,800 |

| | | | | | | | | | | |
|------|-----------|----------------------------------|----------------------|------------------|-----------|---|----------|-----------|----------------|---------|
| 2825 | C00369181 | REPUBLICAN PARTY OF BEXAR COUNTY | | SCOTT J STRATTON | \$525,080 | 0 | 8/6/2014 | 22 | \$21,558 | \$220 |
| 2826 | C00547299 | RICHARD BOLGER FOR CONGRESS | BOLGER, RICHARD OWEN | JAMES B VELTRI | \$223,226 | 0 | | Not Filed | \$74,409 (est) | \$2,970 |

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Reason To Believe Recommendation - 2014)
July Quarterly Report for the Administrative)
Fine Program:)

BOB CASEY FOR SENATE INC, and) AF# 2815
CHARLES LYONS as treasurer;)

REPUBLICAN PARTY OF BEXAR) AF# 2825
COUNTY, and STRATTON, SCOTT J as)
treasurer;)

1506270000004

RICHARD BOLGER FOR CONGRESS, AF# 2826
and JAMES B VELTRI as treasurer;

CERTIFICATION

I, Shawn Woodhead Werth, Secretary and Clerk of the Federal Election Commission, do hereby certify that on September 16, 2014 the Commission took the following actions on the Reason To Believe Recommendation - 2014 July Quarterly Report for the Administrative Fine Program as recommended in the Reports Analysis Division's Memorandum dated September 12, 2014, on the following committees:

AF#2815 Decided by a vote of 6-0 to: (1) find reason to believe that BOB CASEY FOR SENATE INC, and CHARLES LYONS as treasurer violated 52 U.S.C. 30104(a) (formerly 2 U.S.C. 434(a)) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

**Federal Election Commission
Certification for Administrative Fines
September 16, 2014**

Page 3

TELEPHONE

AF#2825 Decided by a vote of 6-0 to: (1) find reason to believe that REPUBLICAN PARTY OF BEXAR COUNTY, and STRATTON, SCOTT J as treasurer violated 52 U.S.C. 30104(a) (formerly 2 U.S.C. 434(a)) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#2826 Decided by a vote of 6-0 to: (1) find reason to believe that RICHARD BOLGER FOR CONGRESS, and JAMES B VELTRI as treasurer violated 52 U.S.C. 30104(a) (formerly 2 U.S.C. 434(a)) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

Attest:

September 17, 2014
Date

Shawn Woodhead Werth
Shawn Woodhead Werth
Secretary and Clerk of the Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 17, 2014

Charles Lyons, in official capacity as Treasurer
Bob Casey for Senate Inc.
P.O. Box 58746
Philadelphia, PA 19102

C00431056
AF#: 2815

Dear Mr. Lyons:

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file a July Quarterly Report of Receipts and Disbursements every calendar year. This report, covering the period April 1, 2014 through June 30, 2014, shall be filed no later than July 15, 2014. 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)). Records at the Federal Election Commission ("FEC") indicate that this report was not filed within thirty (30) days of the due date. You should file this report if you have not already done so.

The Act permits the FEC to impose civil money penalties for violations of the reporting requirements of 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)). 52 U.S.C. § 30109g(a)(4) (formerly 2 U.S.C. § 437g(a)(4)). On September 16, 2014, the FEC found that there is reason to believe ("RTB") that Bob Casey for Senate Inc. and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)) by failing to file timely this report on or before July 15, 2014. Based on the FEC's schedules of civil money penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at the RTB stage is \$9,800. Please see the attached copy of the Commission's administrative fine regulations at 11 CFR §§ 111.30-111.55. Attachment 1. The Commission's website contains further information about how the administrative fine program works and how the fines are calculated. See <http://www.fec.gov/af/af.shtml>. 11 CFR § 111.34. Your payment of \$9,800 is due within forty (40) days of the finding, or by October 26, 2014, and is based on these factors:

Sensitivity of Report: Not Election Sensitive
Level of Activity: \$282,431
Number of Days Late: Not Filed
Number of Previous Civil Money Penalties Assessed: 0

At this juncture, the following courses of action are available to you:

1. If You Choose to Challenge the RTB Finding and/or Civil Money Penalty

If you should decide to challenge the RTB finding and/or calculated civil money penalty, you must submit a written response, including the AF# found at the top of page 1 under your

committee's identification number, to the FEC's Office of Administrative Review, 999 E Street, NW, Washington, DC 20463. Your response must be received within forty (40) days of the Commission's RTB finding, or October 26, 2014. 11 CFR § 111.35(a). Your written response must include the reason(s) why you are challenging the RTB finding and/or calculated civil money penalty, and must include the factual basis supporting the reason(s) and supporting documentation. The FEC strongly encourages that documents be submitted in the form of affidavits or declarations. 11 CFR § 111.36(c).

The FEC will only consider challenges that are based on at least one of three grounds: (1) a factual error in the RTB finding; (2) miscalculation of the calculated civil money penalty by the FEC; or (3) your demonstrated use of best efforts to file in a timely manner when prevented from doing so by reasonably unforeseen circumstances that were beyond your control. 11 CFR § 111.35(b). In order for a challenge to be considered on the basis of best efforts, you must have filed the required report no later than 24 hours after the end of these reasonably unforeseen circumstances. *Id.* Examples of circumstances that will be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) a failure of Commission computers or Commission-provided software despite your seeking technical assistance from Commission personnel and resources; (2) a widespread disruption of information transmissions over the Internet that is not caused by a failure of the Commission's or your computer systems or Internet service provider; and (3) severe weather or other disaster-related incident. 11 CFR § 111.35(c). Examples of circumstances that will not be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) negligence; (2) delays caused by vendors or contractors; (3) treasurer and staff illness, inexperience or unavailability; (4) committee computer, software, or Internet service provider failures; (5) failure to know filing dates; and (6) failure to use filing software properly. 11 CFR § 111.35(d).

The "failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver" of your right to present such argument in a petition to the U.S. district court under 52 U.S.C. § 30109g (formerly 2 U.S.C. § 437g). 11 CFR § 111.38.

If you intend to be represented by counsel, please advise the Office of Administrative Review. You should provide, in writing, the name, address and telephone number of your counsel and authorize counsel to receive notifications and communications relating to this challenge and imposition of the calculated civil money penalty.

2. If You Choose Not to Pay the Civil Money Penalty and Not to Submit a Challenge

If you do not pay the calculated civil money penalty and do not submit a written response, the FEC will assume that the preceding factual allegations are true and make a final determination that Bob Casey for Senate Inc. and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)) and assess a civil money penalty.

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA"), as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701 *et seq.* The FEC may take any and all appropriate action authorized and required by the DCA, as amended, including transfer to the U.S. Department of the Treasury for collection. 11 CFR § 111.51(a)(2).

3. If You Choose to Pay the Civil Money Penalty

If you should decide to pay the calculated civil money penalty, send the enclosed remittance form, along with your payment, to the FEC at the address on page 4. Upon receipt of your payment, the FEC will send you a final determination letter.

NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS

4. Partial Payments

If you make a payment in an amount less than the calculated civil money penalty, the amount of your partial payment will be credited towards the full civil money penalty that the Commission assesses upon making a final determination.

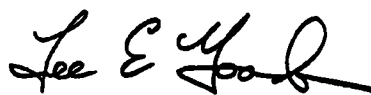
5. Settlement Offers

If you make a payment in an amount less than the calculated civil money penalty as an offer to settle or compromise a debt owed to the Commission, the offer is herewith rejected despite any restrictive endorsements contained on your check or money order or proposed in correspondence transmitted with your check or money order. Acceptance and deposit or cashing of such a restricted payment does not constitute acceptance of the settlement offer. Payments containing restrictive endorsements will be deposited and treated as a partial payment towards the civil money penalty that the Commission assesses upon making a final determination. All unpaid civil money penalty amounts remaining will be subject to the debt collection procedures set forth in Section 2, above.

This matter was generated based on information ascertained by the FEC in the normal course of carrying out its supervisory responsibilities. 52 U.S.C. § 30109g(a)(2) (formerly 2 U.S.C. § 437g(a)(2)). It will remain confidential in accordance with 52 U.S.C. § 30109g(a)(4)(B) (formerly 2 U.S.C. § 437g(a)(4)(B)) and 30109g(a)(12)(A) (formerly 437g(a)(12)(A)) until it is placed on the public record in accordance with 11 CFR § 111.42, unless you notify the FEC in writing that you wish the matter to be made public.

As noted earlier, you may obtain additional information on the FEC's administrative fine program, including the final regulations, on the FEC's website at <http://www.fec.gov/af/af.shtml>. If you have questions regarding the payment of the calculated civil money penalty, please contact Sari Pickerall in the Reports Analysis Division at our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130. If you have questions regarding the submission of a challenge, please contact the Office of Administrative Review at our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

On behalf of the Commission,



Lee E. Goodman
Chairman

ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS

In accordance with the schedule of penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at RTB is \$9,800 for the 2014 July Quarterly Report.

Please mail this remittance with a check or money order made payable to the Federal Election Commission to the following address:

Federal Election Commission
P.O. Box 979058
St. Louis, MO 63197-9000

If you choose to send your remittance and payment by courier or overnight delivery, please use this address:

U.S. Bank - Government Lockbox
FEC #979058
1005 Convention Plaza
Attn: Government Lockbox, SL-MO-C2GL
St. Louis, MO 63101

The remittance and your payment are due by October 26, 2014. Upon receipt of your remittance and payment, the FEC will send you a final determination letter.

PAYMENTS BY PERSONAL CHECK

Personal checks will be converted into electronic funds transfers (EFTS). Your account will be electronically debited for the amount on your check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT

FOR: Bob Casey for Senate Inc.

FEC ID#: C00431056

AF#: 2815

PAYMENT DUE DATE: October 26, 2014

PAYMENT AMOUNT DUE: \$9,800

RECEIVED
FEDERAL ELECTION
COMMISSION

RECEIVED

2014 OCT -2 PM 3:44 2014 OCT -2 PM 12:47

OFFICE OF GENERAL
COUNSEL

FEC MAIL CENTER



FEDERAL ELECTION COMMISSION

999 E Street, NW

Washington, DC 20463

STATEMENT OF DESIGNATION OF COUNSEL

Please use one form for each Respondent/Entity/Treasurer

FAX (202) 219-3923

C00431056

AF#: 2815

MUR #

NAME OF COUNSEL: Brian G. Svoboda and Aria C. Branch

FIRM: Perkins Coie LLP

ADDRESS: 700 13th Street, NW, Suite 600

Washington, DC 20005

TELEPHONE- OFFICE (202) 434-1654

FAX (202) 654-9150

Web Address _____

The above-named individual and/or firm is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

9/23/14
Date

[Signature]
Respondent/Agent Signature

TREASURER
Title (Treasurer/Candidate/Owner)

RESPONDENT: Bob Casey for Senate Inc. and Charles Lyons, Treasurer
(Committee Name, Company Name, or Individual Named in Notification Letter)

MAILING ADDRESS: P. O. Box 58746
(Please Print)

Philadelphia, PA 19102

TELEPHONE- HOME (_____) _____

BUSINESS (215) 405-9660

Information is being sought as part of an investigation being conducted by the Federal Election Commission and the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. This section prohibits making public any investigation conducted by the Federal Election Commission without the express written consent of the person under investigation

RECEIVED

2014 OCT 24 AM 9:11

October 23, 2014

FEC MAIL CENTER
Brian G. Svoboda
BSvoboda@perkinscoie.com
D. (202) 434-1654
F. (202) 654-9150

Mr. Christopher Ritchie
Office of Administrative Review
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Re: AF# 2815

Dear Mr. Ritchie:

We write as counsel to Bob Casey for Senate, Inc. ("the Committee") and Charles Lyons in his official capacity as Treasurer (collectively, "Respondents"), in response to the administrative fine notice in the above-referenced matter dated September 17, 2014. As the enclosed documents demonstrate, the Committee timely filed its July 15 Quarterly Report. As such, the Commission's reason to believe finding is based on factual error and should be promptly dismissed. *See* 11 C.F.R. § 111.35(b)(1).

Commission regulations require a Senate candidate's principal campaign committee to file quarterly reports with the Secretary of the Senate no later than the 15th day following the close of the immediately preceding calendar quarter. *See id.* § 104.5(a)(1). A report is filed timely if it is delivered to the Secretary of the Senate by the close of business on the prescribed filing date. *See id.* § 100.19(a). The Committee's July 15 Quarterly Report was due on July 15, 2014. As the enclosed documents show, Respondents delivered the report to the Secretary of the Senate's Office of Public Records on July 15, 2014 at 4:46 p.m.¹

Unbeknownst to the Committee, an error by its campaign finance software vendor caused the cover page of the report to contain the FEC identification number of another committee.² Upon learning of the error, the Committee filed an amended cover page.³

Still, the Committee timely filed its July 15 Quarterly Report with the Secretary of the Senate. Accordingly, Respondents respectfully request that the Commission dismiss this matter expeditiously.

¹ *See* Exhibit A, a date stamped copy of the cover page of the Committee's July 15 Quarterly Report.

² *See* Exhibit B, a letter from Louis Levine, Senior Vice President, NGP VAN, Inc.

³ *See* Exhibit C, a copy of the amended cover page to the July 15 Quarterly Report which was filed with the Commission on October 15, 2014.

Office of Administrative Review

October 23, 2014

Page 2

We appreciate your Office's consideration of this response, and the Commission's.

Very truly yours,

A handwritten signature in black ink, appearing to read "B. Svoboda", followed by a long horizontal flourish.

Brian G. Svoboda

Aria C. Branch

Counsel to Bob Casey for Senate, Inc. and Charles Lyons, in his official capacity as Treasurer

21-800-21-0001

EXHIBIT A

14-00000-14

Please print clearly this copy
and give to the person to
submit to the IRS

FEC
FORM 3

REPORT OF RECEIPTS
AND DISBURSEMENTS
For An Authorized Committee

RECEIVED
SECRETARY OF STATE
PUBLIC
Office Use Only

1. NAME OF
COMMITTEE (in full)

TYPE OR PRINT

Example: If typing, type
over the lines.

14 JUL 15 PM 4:46
12FE4M5

Bob Casey for Senate Inc

ADDRESS (number and street) P.O. Box 58734

Check if different
than previously
reported. (ACC)

Philadelphia
CITY

PA
STATE

19102
ZIP CODE

2. FEC IDENTIFICATION NUMBER

C00545830

3. IS THIS
REPORT

☒ NEW
(N)

OR

☐ AMENDED
(A)

STATE

DISTRICT

PA

00

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

- ☐ April 15 Quarterly Report (Q1)
☒ July 15 Quarterly Report (Q2)
☐ October 15 Quarterly Report (Q3)
☐ January 31 Year-End Report (YE)

(b) 12-Day PRE-Election Report for the:

- ☐ Primary (12P) ☐ General (12G) ☐ Runoff (12R)
☐ Convention (12C) ☐ Special (12S)

Election on

in the
State of

(c) 30-Day POST-Election Report for the:

- ☐ General (30G) ☐ Runoff (30R) ☐ Special (30S)

Election on

in the
State of

☐ Termination Report (TER)

5. Covering Period 04/01/2014 through 06/30/2014

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Mr. Charles Lyons

Signature of Treasurer

Date

7/14/14

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the Penalties of 2 U.S.C. 437g.

Office
Use
Only

FEC FORM 3
(Revised 02/2003)

EXHIBIT B

October 23, 2014

Mr. Christopher Ritchie
Office of Administrative Review
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Dear Mr. Ritchie:

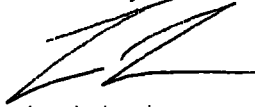
The Bob Casey for U.S. Senate uses software provided by NGP VAN to create their Form 3 reports for the Federal Elections Commission.

On May 19, 2014, NGP VAN employees were conducting a software upgrade for the Casey campaign, and inadvertently put the FEC Committee ID for Keystone America PAC, C00439992, onto the setup for Casey for Senate, instead of the correct Committee ID, C00431056.

This mistake went unnoticed when the committee filed by their July 15th report, and as such, the committee filed their report with the incorrect Committee ID on their cover page.

Please let me know if you need any clarification with regard to this matter,

Sincerely,



Louis Levine
Senior Vice-President, NGPVAN



TECHNICAL

**FEC
FORM 3**

**REPORT OF RECEIPTS
AND DISBURSEMENTS**
For An Authorized Committee

RECEIVED
OFFICE OF THE CLERK OF THE SENATE
12FE4M5

14 OCT 15 PM 5:46

1. NAME OF
COMMITTEE (in full)

TYPE OR PRINT

Example: If typing, type
over the lines.

Bob Casey for Senate Inc

ADDRESS (number and street) P.O. Box 58746

☐ Check if different
than previously
reported. (ACC)

Philadelphia
CITY

PA
STATE

19102
ZIP CODE

2. FEC IDENTIFICATION NUMBER

C00431056

3. IS THIS
REPORT

☐ NEW
(N)

OR

☒ AMENDED
(A)

STATE

DISTRICT

PA

00

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

- ☐ April 15 Quarterly Report (Q1)
☒ July 15 Quarterly Report (Q2)
☐ October 15 Quarterly Report (Q3)
☐ January 31 Year-End Report (YE)

(b) 12-Day PRE-Election Report for the:

- ☐ Primary (12P) ☐ General (12G) ☐ Runoff (12R)
☐ Convention (12C) ☐ Special (12S)

Election on _____ in the
State of _____

(c) 30-Day POST-Election Report for the:

- ☐ Termination Report (TER) ☐ General (30G) ☐ Runoff (30R) ☐ Special (30S)

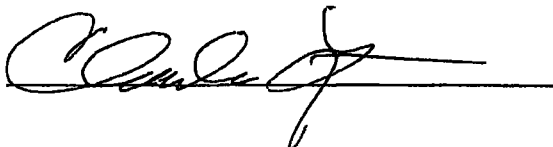
Election on _____ in the
State of _____

5. Covering Period 04/01/2014 through 06/30/2014

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Mr. Charles Lyons

Signature of Treasurer



Date 10/14/14

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the Penalties of 2 U.S.C. 437g.

Office
Use
Only

FEC FORM 3
(Revised 02/2003)



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 28, 2014

Brian G. Svoboda and Aria C. Branch
Perkins Coie LLP
700 13th Street, NW
Suite 600
Washington, DC 20005

C00431056
AF#: 2815

Dear Mr. Svoboda and Ms. Branch:

On October 24, 2014, the Commission's Office of Administrative Review ("OAR") received your written response ("challenge") for Bob Casey for Senate, Inc. and Charles Lyons, in his official capacity as Treasurer, which is being reviewed by OAR. If you have any questions regarding your challenge, please contact this Office on our toll free number (800)424-9530 (press 0, then ext. 1660) or (202)694-1660.

Sincerely,

A handwritten signature in cursive script that reads "Rhiannon Magruder".

Rhiannon Magruder
Reviewing Officer
Office of Administrative Review

Date: November 5, 2014

**REFERRAL TO OFFICE OF ADMINISTRATIVE REVIEW
CHALLENGE RECEIVED**

AF#: 2815

Committee Name: Bob Casey for Senate Inc

Committee ID#: C00431056

Committee Address (if different than in RTB letter): N/A

Treasurer Name (if different than in RTB finding): N/A

Attachments:

- **Copy of RTB Circulation Report, dated September 12, 2014 and RTB Certification, dated September 17, 2014 (Y/N):** Previously Forwarded
- **Proof of Delivery (to be forwarded at later date if not yet received) (Y/N):** Y
- **Other Relevant Telecoms (Y/N):** N
- **Original Correspondence Received by RAD in Response to RTB Letter (Y/N):** N
- **RAD Staff Declaration (Y/N):** Y
 - 2014 July Quarterly Report Notice, dated June 20, 2014.
 - Non-Filer Letter, dated September 18, 2014.
 - RTB Letter, dated September 17, 2014.
- **Other RAD Information: (Y/N):** N

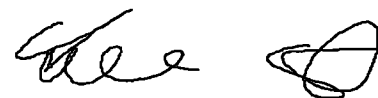


Date: September 29, 2014

Sari Pickerall:

The following is in response to your September 29, 2014 request for delivery information on your Priority Mail Express® item number EQ826644628US. The delivery record shows that this item was delivered on September 22, 2014 at 9:54 am in PHILADELPHIA, PA 19102 to T STEIN. The scanned image of the recipient information is provided below.

Signature of Recipient :
(Authorized Agent)


Taka Stein

Address of Recipient :

PO Box 58746
Phila PA 19102

Thank you for selecting the Postal Service for your mailing needs.

If you require additional assistance, please contact your local Post Office or postal representative.

Sincerely,
United States Postal Service

DECLARATION OF KRISTIN D. ROSER

1. I am the Chief of the Compliance Branch for the Reports Analysis Division of the Federal Election Commission ("Commission"). In my capacity as Chief of the Compliance Branch, I oversee the initial processing of the Administrative Fine Program. I make this declaration based on my personal knowledge and, if called upon as a witness, could and would testify competently to the following matters.
2. I hereby certify that documents identified herein are true and accurate copies of the following sent by the Commission to Bob Casey for Senate Inc:
 - A) Report Notice, dated June 20, 2014, referencing the 2014 July Quarterly Report (sent via electronic mail to: talia@bobcasey.com);
 - B) Non-Filer Letter, dated September 18, 2014, referencing the 2014 July Quarterly Report (sent via regular mail to the committee's address of record);
 - C) Reason-to-Believe Letter, dated September 17, 2014 referencing the 2014 July Quarterly Report (sent via overnight mail to the address of record).
3. I hereby certify that I have searched the Commission's public records and find that Bob Casey for Senate Inc filed the 2014 July Quarterly Report disclosing the committee identification number for the Keystone Victory Fund (C00545830) with the Commission on July 15, 2014.
4. Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct and that all relevant telecoms for the matter have been provided. This declaration was executed at Washington, D.C. on the 5th day of November, 2014.



Kristin D. Roser
Chief, Compliance Branch
Reports Analysis Division
Federal Election Commission

1100027000274

JULY QUARTERLY REPORT NOTICE

FEDERAL ELECTION COMMISSION

**CONGRESSIONAL COMMITTEES
PARTIES AND PACS**

June 20, 2014

CURRENT REPORT DUE

| REPORT | CLOSE OF BOOKS <u>1</u> | REG./CERT. & OVERNIGHT MAILING DEADLINE | FILING DEADLINE |
|----------------|-------------------------|---|-----------------|
| July Quarterly | 06/30/14 | 07/15/14 | 07/15/14 |

PRE- AND POST-ELECTION REPORTS

Congressional Committees

The principal campaign committee of any candidate participating in a 2014 state primary, nominating convention or runoff election – even if unopposed – must also file a pre-election report 12 days prior to the primary, nominating convention or runoff. The principal campaign committee of a candidate participating in the general election must file pre- and post-general election reports. Separate notices will be sent to explain these additional reporting obligations. See 11 CFR 104.5(a)(2).

Parties and PACs

Committees that make contributions or expenditures (including independent expenditures) in connection with an election must also file a Pre-Election Report, if the activity was not previously reported. See 11 CFR 104.5(c)(1)(ii).

- Web Page: 2014 Congressional Pre-Primary Reporting Dates
- *The Record*:
 - FEC Record Blog: Reporting
 - January 2014 Reporting Article [PDF]

SUPPLEMENTAL FILING INFORMATION

- Congressional Committees
- Parties and PACs

REPORTING SCHEDULE FOR REMAINDER OF 2014

| REPORT | CLOSE OF BOOKS <u>1</u> | REG./CERT. & OVERNIGHT MAILING DEADLINE | FILING DEADLINE |
|----------------------|-------------------------|---|-------------------|
| October Quarterly | 09/30/14 | 10/15/14 | 10/15/14 |
| Pre-General <u>2</u> | 10/15/14 | 10/20/14 | 10/23/14 |
| Post-General | 11/24/14 | 12/04/14 | 12/04/14 |
| Year-End | 12/31/14 | 01/31/15 | 01/31/15 <u>3</u> |

SUPPLEMENTAL FILING INFORMATION

- Congressional Committees
- Parties and PACs

FOOTNOTES:

1 These dates indicate the end of the reporting period. A reporting period always begins the day after the closing date of the last report filed. If the committee is new and has not previously filed a report, the first report must cover all activity that occurred before the committee registered up through the close of books for the first report due.

*2 **Parties and PACs:** required only if committee makes contributions or expenditures in connection with the general election during the reporting period. See 11 CFR 104.5(c)(1)(ii).*

***Congressional Committees:** the principal campaign committee of a candidate who participates in the general election must file pre-and post-general election reports. See 11 CFR 104.5(a)(2).*

3 Notice that this filing deadline falls on a weekend. Filing deadlines are not extended when they fall on nonworking days. Accordingly, reports filed by methods other than Registered, Certified or Overnight Mail, or electronically, must be received before the Commission's (or for committees supporting only Senate candidates, the Secretary of the Senate's Public Records Office) close of business on the last business day before the deadline. See also Supplemental Filing Information [Congressional Committees] [Parties and PACs].

FOR INFORMATION, CALL: (800) 424-9530 or (202) 694-1100

Return to 2014 Reporting Schedule

Other Filing Information:

- Electioneering Communications Periods
- 48- and 24-Hour Reports of Independent Expenditures Periods
- Coordinated Communications Periods
- Federal Election Activity Periods

(top of page)



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 18, 2014

RQ-7

CHARLES LYONS, TREASURER
BOB CASEY FOR SENATE, INC
POST OFFICE BOX 58746
PHILADELPHIA, PA 19102

IDENTIFICATION NUMBER: C00431056

REFERENCE: JULY QUARTERLY REPORT 4/1/2014 – 6/30/2014

Dear Treasurer:

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced report of receipts and disbursements or failed to file a report covering the entire reporting period as required by the Federal Election Campaign Act, as amended. 52 U.S.C. §30104(a) (formerly 2 U.S.C. §434(a))

It is important that you file this report immediately. The report must be filed with the Federal Election Commission, 999 E Street, N.W., Washington, DC 20463 for House candidates, or the Secretary of the Senate, 232 Hart Senate Office Building, Washington, DC 20510 (if sent via overnight delivery service) or Senate Office of Public Records, P.O. Box 77578, Washington, DC 20013-7578 (if sent via USPS) for Senate Candidates. Please note that electronic filers must submit their reports electronically, as per 11 CFR §104.18. A copy of the report must also be filed with the Secretary of State or equivalent State officer unless the State is exempt from the federal requirement to receive and maintain paper copies. You can verify the Commission's receipt of any documents submitted by your committee on the FEC website at www.fec.gov.

The failure to timely file a complete report may result in civil money penalties, an audit or legal enforcement action. The civil money penalty calculation for late reports does not include a grace period and begins on the day following the due date for the report. Due to heightened security screening measures, delivery of mail by the US Postal Service may be delayed. The Commission recommends that you submit your report via overnight delivery or courier service.

If you have any questions regarding this matter, please contact Chris Ritchie in the Reports Analysis Division on our toll free number (800)424-9530. His direct number is (202)694-1146.

Sincerely,

Debbie Chacona

Debbie Chacona
Assistant Staff Director
Reports Analysis Division (RAD)



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

2014 NOV 25 PM 3:15

SENSITIVE

November 25, 2014

MEMORANDUM

To: The Commission

Through: Alec Palmer *AP*
Staff Director

From: Patricia C. Orrock *PCO*
Chief Compliance Officer

Rhiannon Magruder *RM*
Reviewing Officer
Office of Administrative Review

Subject: AF# 2815 – Bob Casey for Senate Inc. and Charles Lyons, in his official capacity
as Treasurer (C00431056)

The attached Reviewing Officer Recommendation is being circulated on an informational basis. A copy was also sent to the respondents in accordance with 11 C.F.R. § 111.36(f). The respondents may file with the Commission Secretary a written response within 10 days of transmittal of the recommendation. After the 10 day period, the Reviewing Officer Recommendation and the respondents' written response, if any, will be circulated to the Commission to make a final determination.

Attachment



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 25, 2014

**REVIEWING OFFICER RECOMMENDATION
OFFICE OF ADMINISTRATIVE REVIEW ("OAR")**

AF# 2815 – Bob Casey for Senate Inc. and Charles Lyons, in his official capacity as Treasurer (C00431056)

Summary of Recommendation

Take no further action that the respondents violated 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a))¹ and close the file.

Reason-to-Believe Background

The 2014 July Quarterly Report was due on July 15, 2014. On September 16, 2014, the Commission found reason to believe ("RTB") that the respondents violated 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)) for failing to timely file the 2014 July Quarterly Report and made a preliminary determination that the civil money penalty was \$9,800 based on the schedule of penalties at 11 C.F.R. § 111.43. A letter was mailed to the respondents' address of record from the Reports Analysis Division ("RAD") on September 17, 2014 to notify them of the Commission's RTB finding and civil money penalty.

Legal Requirements

The Federal Election Campaign Act ("Act") states that the treasurer of a principal campaign committee shall file a report for the quarter ending June 30 no later than July 15. 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)) and 11 C.F.R. § 104.5(a)(1)(i). All reports required to be filed by the principal campaign committee of a candidate for the office of U.S. Senator shall be filed with the Secretary of the Senate. 52 U.S.C. § 30102(g) (formerly 2 U.S.C. § 432(g)) and 11 C.F.R. § 105.2. If the report is sent by registered or certified mail, by Express or Priority Mail with delivery confirmation or by overnight delivery service with an online tracking system, and scheduled for next business day delivery, it must be postmarked, or deposited with the mailing service, no later than the filing date to be timely filed. 52 U.S.C. § 30104(a)(5) (formerly 2 U.S.C. § 434(a)(5)), and 11 C.F.R. §§ 100.19 and 104.5(e). The treasurer shall be personally responsible for the timely and complete filing of reports and for the accuracy of any information or statement contained in it. 11 C.F.R. § 104.14(d).

Respondents' Challenge

On October 24, 2014, the Commission received the written response ("challenge") from the Committee's Counsel. Counsel states that the Committee timely filed the report, and the Commission's RTB finding is based on factual error. The respondents request that the matter be dismissed expeditiously.

¹ On September 1, 2014, the Federal Election Campaign Act of 1971, as amended ("the Act"), was transferred from Title 2 of the United States Code to new Title 52 of the United States Code.

Counsel further explains that the Committee's 2014 July Quarterly Report was delivered to the Secretary of the Senate on July 15, 2014 at 4:46 p.m. However, "an error by its campaign finance software vendor caused the cover page of the report to contain the FEC identification number of another committee. Upon learning of the error, the Committee filed an amended cover page."

The challenge includes the following exhibits:

- Exhibit A: Date stamped copy of the cover page of the Committee's 2014 July Quarterly Report
- Exhibit B: Letter from Louis Levin, Senior Vice President, NGP VAN, Inc.
- Exhibit C: Copy of the amended cover page to the 2014 July Quarterly Report filed October 15, 2014

Analysis

The exhibits included with the challenge provide evidence that the Committee's filing software vendor included an incorrect committee identification number on the cover page of the Committee's original 2014 July Quarterly Report. Exhibit C notes that the originally provided identification number of C00439992 was registered to Keystone America PAC. However, the cover page of the originally filed 2014 July Quarterly Report discloses C00545830 as the identification number, which is registered to Keystone Victory Fund. Nonetheless, both of these committees are associated with Bob Casey for Senate Inc.²

According to the Assistant Staff Director of RAD, on August 4, 2014, the Secretary of the Senate's Office of Public Records ("OPR") confirmed receipt of the Committee's 2014 July Quarterly Report filed on July 15, 2014. Therefore, RAD did not include the respondents in the August 4, 2014 distribution of 2014 July Quarterly Report Non-Filer Notices.

After confirming the Committee's filing index did not include the 2014 July Quarterly Report, RAD recommended that the Commission include the respondents in the Administrative Fine Program RTB findings for the 2014 July Quarterly Report. On September 16, 2014, the Commission found RTB that the respondents violated the Act and made a preliminary determination that the civil money penalty was \$9,800. On September 17, 2014, RAD sent the Committee the RTB letter, and on September 18, 2014, RAD sent the Non-Filer Notice.

On September 23, 2014, Ms. Aria Branch, Counsel, contacted a RAD Compliance Analyst regarding the RTB finding. Ms. Branch indicated her intent to challenge because the report was timely filed. The Analyst advised her to include documentation that proved the report was filed timely with the Secretary of the Senate. The Analyst also explained the Commission had not yet received the report.

² Keystone America PAC (C00439992) is a Leadership PAC sponsored by Keystone Victory Fund (C00545830). See Image 14960028150. Keystone Victory Fund (C00545830) is a Joint Fundraising Representative of Bob Casey for Senate Inc. (C00431056). See Images 13031074627 and 13020413080.

On October 3, 2014, Mr. Brian Svoboda, Counsel, contacted another RAD Compliance Analyst regarding the Non-Filer Notice. Mr. Svoboda explained the report was actually filed timely with the correct committee name and financial activity; however, the report listed an incorrect committee identification number. Mr. Svoboda explained that the filing error also resulted in the Committee being fined for failure to timely file the report. Upon further research, RAD determined that the report in question was indexed under the incorrectly disclosed committee identification number. As such, the Analyst advised Mr. Svoboda to file the cover pages of the Committee's 2014 July Quarterly Report with the Committee's correct identification number and include a memo explaining the original filing error. The Analyst also advised the Committee of the option to challenge the RTB finding.

On October 15, 2014, the Committee filed copies of the cover page, summary page, and detailed summary pages of the originally filed 2014 July Quarterly Report. The cover page disclosed the Committee's correct identification number. The Committee also included miscellaneous text which stated: "Bob Casey for Senate originally filed this report timely on July 15, 2014." The Committee made no adjustments to the financial activity disclosed.

The treasurer shall be personally responsible for the accuracy of any information contained in a report. 11 C.F.R. § 104.14(d). However, in an effort to make the public record clear and accurate, Commission staff may take necessary action to correct minor administrative errors in committee information. In this situation, RAD requested that the Commission's Public Disclosure Division re-index the Committee's 2014 July Quarterly Report under the correct identification number. The Committee's originally filed report is now indexed with the respondents' other filings, with a receipt date of July 15, 2014.

The originally filed report disclosed the correct committee name, and there have been no subsequent adjustments to the relevant financial activity to date. Therefore, the Reviewing Officer agrees with the staff's decision to consider the 2014 July Quarterly Report received July 15, 2014 as the Committee's official filing and recommends that the Commission take no further action and close the file.

OAR Recommendations

- (1) Take no further action in AF# 2815 that Bob Casey for Senate Inc. and Charles Lyons, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)) and close the file; and
- (2) Send the appropriate letter.

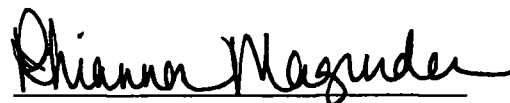
Reviewing Officer: Rhiannon Magruder

Attachments

- Attachment 1 – Challenge Received from Respondents
- Attachment 2 –
- Attachment 3 – Declaration from RAD
- Attachment 4 – Declaration from OAR

DECLARATION OF RHIANNON MAGRUDER

1. I am the Reviewing Officer in the Office of Administrative Review for the Federal Election Commission ("Commission"). In my capacity as Reviewing Officer, I conduct research with respect to all challenges submitted in accordance with the Administrative Fine program.
2. The 2014 July Quarterly Report is due July 15, 2014. Senate principal campaign committees must file reports with the Secretary of the Senate. If the report is sent by registered or certified mail, by Express or Priority Mail with delivery confirmation or by overnight delivery service with an online tracking system, and scheduled for next business day delivery, it must be postmarked, or deposited with the mailing service, no later than the filing date to be timely filed.
3. It is the practice of the Reports Analysis Division to document all calls to or from committees regarding a letter they receive or any questions relating to administrative fine regulations, including due dates of reports and filing requirements.
4. I hereby certify that I have searched the Commission's public records and that the documents identified herein are the true and accurate copies of
 - A. Statement of Organization filed September 27, 2013 by Bob Casey for Senate Inc. and Charles Lyons, in official capacity as Treasurer. Line 6 discloses Keystone Victory Fund as a Joint Fundraising Representative.
 - B. Statement of Organization filed June 11, 2013 by Keystone Victory Fund and Mike Adams, in official capacity as Treasurer. Line 5(g) discloses the committee as a Joint Fundraising Representative, with Bob Casey for Senate as a participating committee.
 - C. Statement of Organization filed January 20, 2014 by Keystone America PAC and Douglas A. Campbell, in official capacity as Treasurer. Line 5(f) discloses the committee as a Leadership PAC, and Line 6 discloses Keystone Victory Fund as the sponsor.
 - D. Cover Page, Summary Page, Detailed Summary Pages, and the Senate Office of Public Records processing sheet for the 2014 Year End Report filed by Bob Casey for Senate Inc. and Charles Lyons, in official capacity as Treasurer. According to the Commission's records, the report covers the period from April 1 through June 30, 2014 and was filed on July 15, 2014.
 - E. Amended 2014 Year End Report filed October 15, 2014 by Bob Casey for Senate Inc. and Charles Lyons, in official capacity as Treasurer.
5. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed at Washington on the 25th of November, 2014.



Rhiannon Magruder
Reviewing Officer
Office of Administrative Review
Federal Election Commission

FEC
FORM 1

STATEMENT OF ORGANIZATION

RECEIVED
SECRETARY OF STATE
PUBLIC RECORDS

13 SEP 27 PM 2:55

Office Use Only

1. NAME OF
COMMITTEE (in full)

☐

(Check if name
is changed)

Example: If typing, type
over the lines.

12FE4M5

Bob Casey for Senate Inc

ADDRESS (number and street)

PO Box 58746

☐

(Check if address
is changed)

Philadelphia

CITY ▲

PA

STATE ▲

19102

ZIP CODE ▲

COMMITTEE'S E-MAIL ADDRESS

☐

(Check if address
is changed)

talía@bobcasey.com

Optional Second E-Mail Address

COMMITTEE'S WEB PAGE ADDRESS (URL)

☐

(Check if address
is changed)

http://www.bobcasey.com

2. DATE

09 / 20 / 2013

09 / 20 / 2013

09 / 20 / 2013

3. FEC IDENTIFICATION NUMBER ►

C C00431056

4. IS THIS STATEMENT

☐

NEW (N)

OR

☒

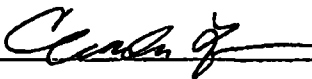
AMENDED (A)

I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Charles Lyons

Signature of Treasurer

Charles Lyons



Date

09 / 20 / 2013

09 / 20 / 2013

09 / 20 / 2013

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g.
ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.

Office
Use
Only

For further information contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-694-1100

FEC FORM 1
(Revised 08/2012)

13020413080

5. TYPE OF COMMITTEE

Candidate Committee:

- (a) ☒ This committee is a principal campaign committee. (Complete the candidate information below.)
- (b) ☐ This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of Candidate

Robert P. Casey Jr.

Candidate Party Affiliation

DEM

Office Sought:

☐ House☒ Senate☐ President

State

PA

District

00

- (c) ☐ This committee supports/opposes only one candidate, and is NOT an authorized committee.

Name of Candidate

Party Committee:

- (d) ☐ This committee is a (National, State or subordinate) committee of the (Democratic, Republican, etc.) Party.

Political Action Committee (PAC):

- (e) ☐ This committee is a separate segregated fund. (Identify connected organization on line 6.) Its connected organization is a:

☐

Corporation

☐

Corporation w/o Capital Stock

☐

Labor Organization

☐

Membership Organization

☐

Trade Association

☐

Cooperative

☐

In addition, this committee is a Lobbyist/Registrant PAC.

- (f) ☐ This committee supports/opposes more than one Federal candidate, and is NOT a separate segregated fund or party committee. (i.e., nonconnected committee)

☐

In addition, this committee is a Lobbyist/Registrant PAC.

☐

In addition, this committee is a Leadership PAC. (Identify sponsor on line 6.)

Joint Fundraising Representative:

- (g) ☐ This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, at least one of which is an authorized committee of a federal candidate.
- (h) ☐ This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, none of which is an authorized committee of a federal candidate.

Committees Participating in Joint Fundraiser

1.

FEC ID number

C

2.

FEC ID number

C

3.

FEC ID number

C

4.

FEC ID number

C

13020413081

13020413081

Write or Type Committee Name

Bob Casey for Senate Inc

6. Name of Any Connected Organization, Affiliated Committee, Joint Fundraising Representative, or Leadership PAC Sponsor

Keystone Victory Fund

Mailing Address

PO Box 58746

Philadelphia

PA

19102

CITY

STATE

ZIP CODE

Relationship: ☐ Connected Organization ☐ Affiliated Committee ☒ Joint Fundraising Representative ☐ Leadership PAC Sponsor

7. Custodian of Records: Identify by name, address (phone number -- optional) and position of the person in possession of committee books and records.

Full Name

Charles Lyons

Mailing Address

PO Box 58746

Philadelphia

PA

19102

Title or Position

CITY

STATE

ZIP CODE

Treasurer

Telephone number

215

880

7224

8. Treasurer: List the name and address (phone number -- optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name
of Treasurer

Charles Lyons

Mailing Address

PO Box 58746

Philadelphia

PA

19102

Title or Position
Treasurer

CITY

STATE

ZIP CODE

Telephone number

215

880

7224

13020413082

UNRECORDED COPY

Full Name of
Designated
Agent

Mailing Address

Title or Position

Telephone number

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.

PNC Bank

Mailing Address

1600 Market Street

Philadelphia

PA

19102

CITY

STATE

ZIP CODE

Name of Bank, Depository, etc.

Mailing Address

DC

CITY

STATE

ZIP CODE

13020413083

FORM 1S -STATEMENT OF ORGANIZATION (Supplemental Page)

FEC Form 1 (Revised 06/2011)

Page 5

Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.

[ADDITIONAL]

PNC Bank

Mailing Address

650 Pennsylvania Ave SE

Washington

DC

20003

CITY

STATE

ZIP CODE

[ADDITIONAL]

Name of Any Connected Organization, Affiliated Committee, Joint Fundraising Representative, or Leadership PAC Sponsor

Ohio Pennsylvania Victory Fund

Mailing Address

600 Pennsylvania Avenue, SE

Suite 210

Washington

DC

20003

CITY

STATE

ZIP CODE

Relationship:



Connected Organization



Affiliated Committee



Joint Fundraising Representative



Leadership PAC Sponsor

[ADDITIONAL]

Designated Agent

Full Name

Mailing Address

Title or Position

CITY

STATE

ZIP CODE

Telephone number

Joint Fundraiser Participant

[ADDITIONAL]

FEC ID number

C

13020413084

FEC
FORM 1

STATEMENT OF
ORGANIZATION

RECEIVED
SECRETARY OF THE SENATE
PUBLIC RECORDS

13 JUN 11 PM 2:49
Office Use Only

1. NAME OF
COMMITTEE (in full)



(Check if name
is changed)

Example: If typing, type
over the lines.

12PE4M5

Keystone Victory Fund

ADDRESS (number and street)

P.O. Box 58746



(Check if address
is changed)

Philadelphia

CITY ▲

PA

STATE ▲

19102-1

ZIP CODE ▲

COMMITTEE'S E-MAIL ADDRESS



(Check if address
is changed)

hailia@bobciasey.com

Optional Second E-Mail Address

apfacible@bobciasey.com

COMMITTEE'S WEB PAGE ADDRESS (URL)



(Check if address
is changed)

NA

2. DATE

05/22/2013

3. FEC IDENTIFICATION NUMBER ►

C

4. IS THIS STATEMENT



NEW (N)

OR



AMENDED (A)

I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer

MIKE ADAMS

Signature of Treasurer

Mike Adams

Date

05/29/2013

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g.
ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.

Office
Use
Only

For further information contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-684-1100

FEC FORM 1
(Revised 06/2012)

2013 JUN 12 PM 3:05
FEDERAL ELECTION
COMMISSION
PUBLIC AFFAIRS
DIVISION

13031074627

5. TYPE OF COMMITTEE

Candidate Committee:

- (a) ☐ This committee is a principal campaign committee. (Complete the candidate information below.)
- (b) ☐ This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of Candidate

Candidate Party Affiliation

Office Sought:

House

Senate

President

State

District

- (c) ☐ This committee supports/opposes only one candidate, and is NOT an authorized committee.

Name of Candidate

Party Committee:

- (d) ☐ This committee is a ☐ (National, State or subordinate) committee of the ☐ (Democratic, Republican, etc.) Party.

Political Action Committee (PAC):

- (e) ☐ This committee is a separate segregated fund. (Identify connected organization on line 8.) Its connected organization is a:
- ☐ Corporation ☐ Corporation w/o Capital Stock ☐ Labor Organization
- ☐ Membership Organization ☐ Trade Association ☐ Cooperative
- ☐ In addition, this committee is a Lobbyist/Registrant PAC.
- (f) ☐ This committee supports/opposes more than one Federal candidate, and is NOT a separate segregated fund or party committee. (i.e., nonconnected committee)
- ☐ In addition, this committee is a Lobbyist/Registrant PAC.
- ☐ In addition, this committee is a Leadership PAC. (Identify sponsor on line 6.)

Joint Fundraising Representative:

- (g) ☒ This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, at least one of which is an authorized committee of a federal candidate.
- (h) ☐ This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, none of which is an authorized committee of a federal candidate.

Committees Participating in Joint Fundraiser

1. Bobb Clatsky Federal Senate | FEC ID number C00431056
2. Kelystone America PAC | FEC ID number C00439992
3. Pennsylvania Democratic | FEC ID number C00167130
4. | FEC ID number C

13031074628

Write or Type Committee Name

Keystone Victory Fund

6. Name of Any Connected Organization, Affiliated Committee, Joint Fundraising Representative, or Leadership PAC Sponsor

N/A

Mailing Address

CITY

STATE

ZIP CODE

Relationship: ☐ Connected Organization ☒ Affiliated Committee ☐ Joint Fundraising Representative ☐ Leadership PAC Sponsor

7. Custodian of Records: Identify by name, address (phone number -- optional) and position of the person in possession of committee books and records.

Full Name

Theresa Stein

Mailing Address

PO Box 58746PhiladelphiaPA19102

Title or Position

CITY

STATE

ZIP CODE

Finance Director

Telephone number

215-580-7224

8. Treasurer: List the name and address (phone number -- optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name
of TreasurerMike Adams

Mailing Address

PO Box 58746PhiladelphiaPA19102

Title or Position

CITY

STATE

ZIP CODE

Treasurer

Telephone number

13031074629

Full Name of
Designated
Agent

Mailing Address

Title or Position

Telephone number

CITY

STATE

ZIP CODE

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.

PNC Bank

Mailing Address

1600 Market St

Philadelphia

PA

19103

CITY

STATE

ZIP CODE

Name of Bank, Depository, etc.

Mailing Address

CITY

STATE

ZIP CODE

13031074630

**FEC
FORM 1****STATEMENT OF
ORGANIZATION**

Office Use Only

1. NAME OF COMMITTEE (in full) (Check if name is changed) Example: If typing, type over the lines. 12FE4M5

Keystone America PAC

ADDRESS (number and street)

PO Box 58746

☒ (Check if address is changed)

Philadelphia

CITY ▲

PA

STATE ▲

19102

ZIP CODE ▲

COMMITTEE'S E-MAIL ADDRESS

☒ (Check if address is changed)

talia@bobcasey.com

Optional Second E-Mail Address

COMMITTEE'S WEB PAGE ADDRESS (URL)

☐ (Check if address is changed)

2. DATE 01 20 2014

3. FEC IDENTIFICATION NUMBER ► C C00439992

4. IS THIS STATEMENT ☒ NEW (N) OR AMENDED (A)

I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Douglas A. Campbell

Signature of Treasurer Douglas A. Campbell [Electronically Filed] Date 01 20 2014

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g.
ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.

Office
Use
Only

For further information contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-694-1100

FEC FORM 1
(Revised 06/2012)

5. TYPE OF COMMITTEE

Candidate Committee:

- (a) This committee is a principal campaign committee. (Complete the candidate information below.)
- (b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of
Candidate

Candidate
Party Affiliation

Office
Sought:

House

Senate

President

State

District

- (c) This committee supports/opposes only one candidate, and is NOT an authorized committee.

Name of
Candidate

Party Committee:

- (d) This committee is a (National, State or subordinate) committee of the (Democratic, Republican, etc.) Party.

Political Action Committee (PAC):

- (e) This committee is a separate segregated fund. (Identify connected organization on line 6.) Its connected organization is a:

Corporation

Corporation w/o Capital Stock

Labor Organization

Membership Organization

Trade Association

Cooperative

In addition, this committee is a Lobbyist/Registrant PAC.

- (f) ☒ This committee supports/opposes more than one Federal candidate, and is NOT a separate segregated fund or party committee. (i.e., nonconnected committee)

In addition, this committee is a Lobbyist/Registrant PAC.

- ☒ In addition, this committee is a Leadership PAC. (Identify sponsor on line 6.)

Joint Fundraising Representative:

- (g) This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, at least one of which is an authorized committee of a federal candidate.
- (h) This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, none of which is an authorized committee of a federal candidate.

Committees Participating in Joint Fundraiser

1. _____ FEC ID number C
2. _____ FEC ID number C
3. _____ FEC ID number C
4. _____ FEC ID number C

Write or Type Committee Name

Keystone America PAC**6. Name of Any Connected Organization, Affiliated Committee, Joint Fundraising Representative, or Leadership PAC Sponsor****Keystone Victory Fund**

Mailing Address

PO Box 58746

Philadelphia

PA

19102

CITY

STATE

ZIP CODE

Relationship: Connected Organization Affiliated Committee ☒ Joint Fundraising Representative Leadership PAC Sponsor**7. Custodian of Records: Identify by name, address (phone number -- optional) and position of the person in possession of committee books and records.**

Full Name

Douglas A. Campbell

Mailing Address

PO Box 58746

Philadelphia

PA

19102

Title or Position

CITY

STATE

ZIP CODE

Treasurer

Telephone number

8. Treasurer: List the name and address (phone number -- optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).Full Name
of Treasurer

Douglas A. Campbell

Mailing Address

PO Box 58746

Philadelphia

PA

19102

CITY

STATE

ZIP CODE

Title or Position
Treasurer

Telephone number

215

880

7224

Full Name of
Designated
Agent

Mailing Address

Title or Position

Telephone number

CITY

STATE

ZIP CODE

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.

PNC Bank

Mailing Address

1600 Market Street

Philadelphia

PA

19103

CITY

STATE

ZIP CODE

Name of Bank, Depository, etc.

Mailing Address

CITY

STATE

ZIP CODE

FORM 1S -STATEMENT OF ORGANIZATION (Supplemental Page)

FEC Form 1S (Revised 06/2011)

Page 5

Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.

[ADDITIONAL]

Mailing Address

CITY ▲

STATE ▲

ZIP CODE ▲

[ADDITIONAL]

Name of Any Connected Organization, Affiliated Committee, Joint Fundraising Representative, or Leadership PAC Sponsor

Robert P. Casey Jr.

Mailing Address

700 13th Street, NW

Suite 600

Washington

DC

20005

CITY ▲

STATE ▲

ZIP CODE ▲

Relationship:

☐

Connected Organization

☐

Affiliated Committee

☐

Joint Fundraising Representative

☒

Leadership PAC Sponsor

[ADDITIONAL]

Designated Agent

Full Name

Mailing Address

Title or Position ▲

CITY ▲

STATE ▲

ZIP CODE ▲

Telephone number

Joint Fundraiser Participant

[ADDITIONAL]

FEC ID number

C

14960028154

FEC
FORM 3

**REPORT OF RECEIPTS
AND DISBURSEMENTS**
For An Authorized Committee

RECEIVED
SECRETARY OF THE SENATE
PUBLIC RECORDS

11/05/13 11:44:46

1. NAME OF
COMMITTEE (in full)

TYPE OR PRINT

Example: If typing, type
over the lines.

12FE4M5

Bob Casey for Senate Inc

ADDRESS (number and street) P.O. Box 58736

☐ Check if different
than previously
reported. (ACC)

Philadelphia

PA

19102

CITY

STATE

ZIP CODE

2. FEC IDENTIFICATION NUMBER

3. IS THIS
REPORT

☒ NEW
(N)

OR

☐ AMENDED
(A)

STATE

DISTRICT

PA

00

C00545830

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

☐ April 15 Quarterly Report (Q1)

☒ July 15 Quarterly Report (Q2)

☐ October 15 Quarterly Report (Q3)

☐ January 31 Year-End Report (YE)

(b) 12-Day PRE-Election Report for the:

☐ Primary (12P)

☐ General (12G)

☐ Runoff (12R)

☐ Convention (12C)

☐ Special (12S)

Election on

in the
State of

(c) 30-Day POST-Election Report for the:

☐ General (30G)

☐ Runoff (30R)

☐ Special (30S)

Election on

in the
State of

☐ Termination Report (TER)

5. Covering Period

04/01/2014

through

06/30/2014

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Mr. Charles Lyons

Signature of Treasurer

Date

7/14/14

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the Penalties of 2 U.S.C. 437g.

Office
Use
Only

FEC FORM 3
(Revised 02/2003)

SUMMARY PAGE
of Receipts and Disbursements

FEC Form 3 (Revised 02/2003)

PAGE 2 / 137

Write or Type Committee Name

Bob Casey for Senate Inc

Report Covering the Period:

From:

4/1/2014

To:

6/30/2014

| | COLUMN A This Period | COLUMN B Election Cycle-to-Date |
|--|-------------------------|------------------------------------|
| 6. Net Contributions (other than loans) | | |
| (a) Total Contributions (other than loans) (from Line 11(e)) .. | \$206,348.40 | \$932,238.93 |
| (b) Total Contribution Refunds (from Line 20(d)) .. | \$0.00 | \$24,300.00 |
| (c) Net Contribution (other than loans) (subtract Line 6(b) from Line 6(a)) .. | \$206,348.40 | \$907,938.93 |
| 7. Net Operating Expenditures | | |
| (a) Total Operating Expenditures (from Line 17) .. | \$116,418.58 | \$1,044,773.71 |
| (b) Total Offsets to Operating Expenditures (from Line 14) .. | \$0.00 | \$71,117.57 |
| (c) Net Operating Expenditures (subtract Line 7(b) from Line 7(a)) .. | \$116,418.58 | \$973,656.14 |
| 8. Cash on Hand at Close of Reporting Period (from Line 27) .. | \$267,134.63 | |
| 9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D) .. | \$0.00 | |
| 10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D) .. | \$0.00 | |

For further information contact:

Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-694-1100

**DETAILED SUMMARY PAGE
of Receipts**

FEC Form 3 (Revised 02/2003)

PAGE 3 / 137

Write or Type Committee Name

Bob Casey for Senate Inc

Report Covering the Period:

From:

4/1/2014

To:

6/30/2014

| I. RECEIPTS | COLUMN A Total This Period | COLUMN B Election Cycle-to-Date |
|--|-------------------------------|------------------------------------|
| 11. Contributions (other than loans) FROM: | | |
| (a) Individuals/Persons Other Than Political Committees | | |
| (i) Itemized (use Schedule A)... | \$141,809.40 | \$638,767.12 |
| (ii) Unitemized | \$2,439.00 | \$12,720.69 |
| (iii) TOTAL of contributions from individuals .. | \$144,248.40 | \$651,487.81 |
| (b) Political Party Committees | \$0.00 | \$0.00 |
| (c) Other Political Committees (such as PACs) | \$62,100.00 | \$280,751.12 |
| (d) The Candidate | \$0.00 | \$0.00 |
| (e) TOTAL CONTRIBUTIONS (other than loans) (add lines 11(a)(iii), (b), (c), and (d)).. | \$206,348.40 | \$932,238.93 |
| 12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES | \$5,182.32 | \$34,654.75 |
| 13. LOANS: | | |
| (a) Made or Guaranteed by the Candidate .. | \$0.00 | \$0.00 |
| (b) All Other Loans | \$0.00 | \$0.00 |
| (c) TOTAL LOANS (add Lines 13(a) and (b)) | \$0.00 | \$0.00 |
| 14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.) | \$0.00 | \$71,117.57 |
| 15. OTHER RECEIPTS (Dividends, Interest, etc.) | \$0.00 | \$14,002.18 |
| 16. TOTAL RECEIPTS (add Lines 11(e), 12, 13(c), 14, and 15) (Carry Total to Line 24, page 4) | \$211,530.72 | \$1,052,013.43 |

**DETAILED SUMMARY PAGE
of Disbursements**

FEC Form 3 (Revised 02/2003)

PAGE 4 / 137

| II. DISBURSEMENTS | COLUMN A Total This Period | COLUMN B Election Cycle-to-Date |
|---|-------------------------------|------------------------------------|
| 17. OPERATING EXPENDITURES | \$116,418.58 | \$1,044,773.71 |
| 18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES | \$0.00 | \$0.00 |
| 19. LOAN REPAYMENTS: | | |
| (a) Of Loans Made or Guaranteed by the Candidate .. | \$0.00 | \$0.00 |
| (b) Of All Other Loans | \$0.00 | \$0.00 |
| (c) TOTAL LOAN REPAYMENTS (add Lines 19(a) and (b)) .. | \$0.00 | \$0.00 |
| 20. REFUNDS OF CONTRIBUTIONS TO: | | |
| (a) Individuals/Persons Other Than Political Committees .. | \$0.00 | \$23,800.00 |
| (b) Political Party Committees .. | \$0.00 | \$0.00 |
| (c) Other Political Committees (such as PACs) | \$0.00 | \$500.00 |
| (d) TOTAL CONTRIBUTION REFUNDS (add Lines 20(a), (b), and (c)) | \$0.00 | \$24,300.00 |
| 21. OTHER DISBURSEMENTS | \$500.00 | \$57,024.66 |
| 22. TOTAL DISBURSEMENTS (add Lines 17, 18, 19(c), 20(d), and 21) | \$116,918.58 | \$1,126,098.37 |

III. CASH SUMMARY

| | |
|--|--------------|
| 23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD ... | \$172,522.49 |
| 24. TOTAL RECEIPTS THIS PERIOD (from Line 16, page 3) .. | \$211,530.72 |
| 25. SUBTOTAL (add Line 23 and Line 24) .. | \$384,053.21 |
| 26. TOTAL DISBURSEMENTS THIS PERIOD (from Line 22) ... | \$116,918.58 |
| 27. CASH ON HAND AT CLOSE OF REPORTING PERIOD (subtract Line 26 from Line 25) | \$267,134.63 |

FESAND18

14020490568

DISBURSEMENTS

ANCY ERICKSON
SECRETARY

MA C. MCCALLUM
SUPERINTENDENT
Hq. Mail Office
Suite 232
Washington, DC 20510-71
Phone (202) 224-0112

United States Senate

OFFICE OF THE SECRETARY

OFFICE OF PUBLIC RECORDS

THE PRECEDING DOCUMENT WAS:

HAND DELIVERED

Date of Receipt

7-15-14

USPS FIRST CLASS MAIL

Postmark

USPS REGISTERED/CERTIFIED

Postmark

USPS PRIORITY MAIL

Postmark

DELIVERY CONFIRMATION OR SIGNATURE CONFIRMATION LABEL ☐

USPS EXPRESS MAIL

Postmark

OVERNIGHT DELIVERY SERVICE:

SHIPPING DATE

NEXT BUSINESS DAY DELIVERY

FEDERAL EXPRESS

☐

UPS

☐

DHL

☐

AIRBORNE EXPRESS

☐

RECEIVED FROM FEDERAL ELECTION COMMISSION

Date of Receipt

POSTMARK ILLEGIBLE ☐

NO POSTMARK ☐

FAX

Date of Receipt

OTHER

Date of Receipt or Postmark

PREPARER

DH

DATE PREPARED

7-15-14

14020490702

14020490702

FEC
FORM 3

REPORT OF RECEIPTS
AND DISBURSEMENTS

For An Authorized Committee

RECEIVED
SECRETARY OF THE SENATE
PUBLIC RECORDS

11 OCT 15 PM 5:45

1. NAME OF
COMMITTEE (in full)

TYPE OR PRINT

Example: If typing, type
over the lines.

12FE4M5

Bob Casey for Senate Inc

ADDRESS (number and street) P.O. Box 58746

☐ Check if different
than previously
reported. (ACC)

Philadelphia
CITY

PA
STATE

19102
ZIP CODE

2. FEC IDENTIFICATION NUMBER

3. IS THIS
REPORT

☐ NEW
(N)

OR

☒ AMENDED
(A)

STATE

DISTRICT

PA

00

C00431056

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

☐ April 15 Quarterly Report (Q1)

☒ July 15 Quarterly Report (Q2)

☐ October 15 Quarterly Report (Q3)

☐ January 31 Year-End Report (YE)

(b) 12-Day PRE-Election Report for the:

☐ Primary (12P)

☐ General (12G)

☐ Runoff (12R)

☐ Convention (12C)

☐ Special (12S)

Election on

in the
State of

(c) 30-Day POST-Election Report for the:

☐ General (30G)

☐ Runoff (30R)

☐ Special (30S)

Election on

in the
State of

☐ Termination Report (TER)

5. Covering Period

04/01/2014

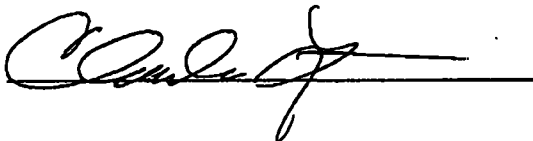
through

06/30/2014

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Mr. Charles Lyons

Signature of Treasurer



Date

10/14/14

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the Penalties of 2 U.S.C. 437g.

Office
Use
Only

FEC FORM 3
(Revised 02/2003)

SUMMARY PAGE
of Receipts and Disbursements

FEC Form 3 (Revised 02/2003)

PAGE 2 / 142

Write or Type Committee Name

Bob Casey for Senate Inc

Report Covering the Period:

From:

4/1/2014

To:

6/30/2014

| | COLUMN A This Period | COLUMN B Election Cycle-to-Date |
|--|---------------------------------------|--|
| 6. Net Contributions (other than loans) | | |
| (a) Total Contributions (other than loans) (from Line 11(e)) | \$206,348.40 | \$932,238.93 |
| (b) Total Contribution Refunds (from Line 20(d)) | \$0.00 | \$24,300.00 |
| (c) Net Contribution (other than loans) (subtract Line 6(b) from Line 6(a)) | \$206,348.40 | \$907,938.93 |
| 7. Net Operating Expenditures | | |
| (a) Total Operating Expenditures (from Line 17) | \$116,418.58 | \$1,044,773.71 |
| (b) Total Offsets to Operating Expenditures (from Line 14) | \$0.00 | \$71,117.57 |
| (c) Net Operating Expenditures (subtract Line 7(b) from Line 7(a)) | \$116,418.58 | \$973,656.14 |
| 8. Cash on Hand at Close of Reporting Period (from Line 27) | \$267,134.63 | |
| 9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D) | \$0.00 | |
| 10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D) | \$0.00 | |

For further information contact:

Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-694-1100

FE5AN018

14020814523

DETAILED SUMMARY PAGE
of Receipts

FEC Form 3 (Revised 02/2003)

PAGE 3 / 142

Write or Type Committee Name

Bob Casey for Senate Inc

Report Covering the Period:

From:

4/1/2014

To:

6/30/2014

I. RECEIPTS

COLUMN A
Total This Period

COLUMN B
Election Cycle-to-Date

11. Contributions (other than loans) FROM:

(a) Individuals/Persons Other Than
Political Committees

(i) Itemized (use Schedule A)...

\$141,809.40

\$638,767.12

(ii) Unitemized

\$2,439.00

\$12,720.69

(iii) TOTAL of contributions
from individuals ..

\$144,248.40

\$651,487.81

(b) Political Party Committees

\$0.00

\$0.00

(c) Other Political Committees
(such as PACs)

\$62,100.00

\$280,751.12

(d) The Candidate

\$0.00

\$0.00

(e) TOTAL CONTRIBUTIONS
(other than loans) (add lines
11(a)(iii), (b), (c), and (d))..

\$206,348.40

\$932,238.93

12. TRANSFERS FROM OTHER
AUTHORIZED COMMITTEES

\$5,182.32

\$34,654.75

13. LOANS:

(a) Made or Guaranteed by the
Candidate ..

\$0.00

\$0.00

(b) All Other Loans

\$0.00

\$0.00

(c) TOTAL LOANS (add
Lines 13(a) and (b))

\$0.00

\$0.00

14. OFFSETS TO OPERATING
EXPENDITURES (Refunds,
Rebates, etc.)

\$0.00

\$71,117.57

15. OTHER RECEIPTS
(Dividends, Interest, etc.)

\$0.00

\$14,002.18

16. TOTAL RECEIPTS (add Lines
11(e), 12, 13(c), 14, and 15) (Carry
Total to Line 24, page 4)

\$211,530.72

\$1,052,013.43

DETAILED SUMMARY PAGE of Disbursements

FEC Form 3 (Revised 02/2003)

PAGE 4 / 142

| II. DISBURSEMENTS | COLUMN A Total This Period | COLUMN B Election Cycle-to-Date |
|---|-------------------------------|------------------------------------|
| 17. OPERATING EXPENDITURES | \$116,418.58 | \$1,044,773.71 |
| 18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES | \$0.00 | \$0.00 |
| 19. LOAN REPAYMENTS: | | |
| (a) Of Loans Made or Guaranteed by the Candidate .. | \$0.00 | \$0.00 |
| (b) Of All Other Loans | \$0.00 | \$0.00 |
| (c) TOTAL LOAN REPAYMENTS (add Lines 19(a) and (b)) .. | \$0.00 | \$0.00 |
| 20. REFUNDS OF CONTRIBUTIONS TO: | | |
| (a) Individuals/Persons Other Than Political Committees .. | \$0.00 | \$23,800.00 |
| (b) Political Party Committees .. | \$0.00 | \$0.00 |
| (c) Other Political Committees (such as PACs) | \$0.00 | \$500.00 |
| (d) TOTAL CONTRIBUTION REFUNDS (add Lines 20(a), (b), and (c)) .. | \$0.00 | \$24,300.00 |
| 21. OTHER DISBURSEMENTS | \$500.00 | \$57,024.66 |
| 22. TOTAL DISBURSEMENTS (add Lines 17, 18, 19(c), 20(d), and 21) | \$116,918.58 | \$1,126,098.37 |

III. CASH SUMMARY

| | |
|--|--------------|
| 23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD ... | \$172,522.49 |
| 24. TOTAL RECEIPTS THIS PERIOD (from Line 16, page 3) .. | \$211,530.72 |
| 25. SUBTOTAL (add Line 23 and Line 24) .. | \$384,053.21 |
| 26. TOTAL DISBURSEMENTS THIS PERIOD (from Line 22) ... | \$116,918.58 |
| 27. CASH ON HAND AT CLOSE OF REPORTING PERIOD (subtract Line 26 from Line 25) | \$267,134.63 |

FE5AN018

14020814525

1 Form/Schedule: F3A
Transaction ID:

Bob Casey for Senate originally filed this report timely on July 15th
2014.

14020814526

14020814526

NANCY ERICKSON
SECRETARY

DANA K. MCCALLUM
SUPERINTENDENT
HART SENATE OFFICE BUILDING
SUITE 232
WASHINGTON, DC 20510-7115
PHONE: (202) 224-0322

United States Senate

OFFICE OF THE SECRETARY

OFFICE OF PUBLIC RECORDS

THE PRECEDING DOCUMENT WAS:

HAND DELIVERED

Date of Receipt

10-15-14

USPS FIRST CLASS MAIL

Postmark

USPS REGISTERED/CERTIFIED

Postmark

USPS PRIORITY MAIL

Postmark

DELIVERY CONFIRMATION OR SIGNATURE CONFIRMATION LABEL ☐

USPS EXPRESS MAIL

Postmark

OVERNIGHT DELIVERY SERVICE:

SHIPPING DATE

NEXT BUSINESS DAY DELIVERY

FEDERAL EXPRESS

☐

UPS

☐

DHL

☐

AIRBORNE EXPRESS

☐

RECEIVED FROM FEDERAL ELECTION COMMISSION

Date of Receipt

POSTMARK ILLEGIBLE ☐

NO POSTMARK ☐

FAX

Date of Receipt

OTHER

Date of Receipt or Postmark

PREPARER

DH

DATE PREPARED

10-15-14

14020814527



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 25, 2014

Brian G. Svoboda and Aria C. Branch
Perkins Coie LLP
700 13th Street, NW
Suite 600
Washington, DC 20005

C00431056
AF#: 2815

Dear Mr. Svoboda and Ms. Branch:

On September 17, 2014, the Federal Election Commission ("Commission") found reason to believe ("RTB") that Bob Casey for Senate, Inc. and Charles Lyons, in his official capacity as Treasurer ("respondents"), violated 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)) for failing to file the 2014 July Quarterly Report. The Commission also made a preliminary determination that the civil money penalty was \$9,800 based on the schedule of penalties at 11 C.F.R. § 111.43.

After reviewing the written response and any supplemental information submitted by you and Commission staff, the Reviewing Officer has recommended that the Commission take no further action and close the file. A copy of the Reviewing Officer's recommendation is attached.

You may file with the Commission Secretary a written response to the recommendation within 10 days of the date of this letter. Your written response should be sent to the Commission Secretary, 999 E Street, NW, Washington, DC 20463 or via facsimile (202-208-3333). Please include the AF # in your response. Your response may not raise any arguments not raised in your original written response or not directly responsive to the Reviewing Officer's recommendation. 11 C.F.R. § 111.36(f). The Commission will then make a final determination in this matter.

Please contact me at the toll free number 800-424-9530 (press 0, then press 1660) or 202-694-1660 if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Rhiannon Magruder".

Rhiannon Magruder
Reviewing Officer
Office of Administrative Review



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

2014 DEC 10 PM 3:35

December 10, 2014

MEMORANDUM

To: The Commission

Through: Alec Palmer *for PCO*
Staff Director

From: Patricia C. Orrock *PCO*
Chief Compliance Officer

Rhiannon Magruder *RM*
Reviewing Officer
Office of Administrative Review

Subject: Final Determination Recommendation in AF# 2815 – Bob Casey for Senate Inc.
and Charles Lyons, in his official capacity as Treasurer (C00431056)

On September 16, 2014, the Commission found reason to believe ("RTB") that the respondents violated 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)) for failing to timely file the 2014 July Quarterly Report and made a preliminary determination that the civil money penalty was \$9,800 based on the schedule of penalties at 11 C.F.R. § 111.43.

On October 24, 2014, the Commission received their written response ("challenge"). After reviewing the challenge, the Reviewing Officer Recommendation ("ROR") dated November 25, 2014 was forwarded to the Commission, a copy was forwarded to the respondents, and is hereby incorporated by reference. The Reviewing Officer agreed with the staff's decision to consider the 2014 July Quarterly Report received July 15, 2014 as the Committee's official filing and recommended that the Commission take no further action and close the file.

Within 10 days of transmittal of the recommendation, they may file a written response with the Commission Secretary which may not raise any arguments not raised in their challenge or not directly responsive to the ROR. 11 C.F.R. § 111.36(f). As of this date, a written response has not been received.

OAR Recommendations

- (1) Take no further action in AF# 2815 that Bob Casey for Senate Inc. and Charles Lyons, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)) and close the file; and
- (2) Send the appropriate letter

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Final Determination Recommendation:) AF 2815
Bob Casey for Senate Inc. and Charles)
Lyons, in his official capacity as)
Treasurer (C00431056))

CERTIFICATION

I, Shawn Woodhead Werth, Secretary and Clerk of the Federal Election Commission, do hereby certify that on January 12, 2015, the Commission decided by a vote of 6-0 to take the following actions in AF 2815:

1. Take no further action in AF# 2815 that Bob Casey for Senate Inc. and Charles Lyons, in his official capacity as Treasurer, violated 52 U.S. C. § 30104(a) (formerly 2 U.S.C. § 434(a)) and close the file.
2. Send the appropriate letter.

Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

Attest:

January 12, 2015
Date

Shawn Woodhead Werth
Shawn Woodhead Werth
Secretary and Clerk of the Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 16, 2015

Brian G. Svoboda and Aria C. Branch
Perkins Coie LLP
700 13th Street, NW
Suite 600
Washington, DC 20005

C00431056
AF#: 2815

Dear Mr. Svoboda and Ms. Branch:

On September 16, 2014, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that Bob Casey for Senate, Inc. and Charles Lyons, in his official capacity as Treasurer ("respondents"), violated 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a))¹ for failing to file the 2014 July Quarterly Report. By letter dated September 17, 2014, the Commission sent notification of the RTB finding that included a civil money penalty calculated at RTB of \$9,800 in accordance with the schedule of penalties at 11 C.F.R. § 111.43. On October 24, 2014, the Office of Administrative Review received your written response challenging the RTB finding.

The Reviewing Officer reviewed the Commission's RTB finding with its supporting documentation and the written response. Based on this review, the Reviewing Officer recommended that the Commission take no further action because the respondents timely filed the report. The basis for the Reviewing Officer's recommendation was included in the Reviewing Officer Recommendation, a copy of which was sent to you on November 26, 2014.

On January 12, 2015, the Commission adopted the Reviewing Officer's recommendation to take no further action with respect to 52 U.S.C. § 30104(a) (formerly 2 U.S.C. § 434(a)) and close the file. A copy of the Final Determination Recommendation is attached.

The confidentiality provisions at 52 U.S.C. § 30109(a)(12) (formerly 2 U.S.C. § 437g(a)(12)) no longer apply and this matter is now public. The file will be made a part of the public record pursuant to 11 C.F.R. § 111.42(b). Although the file must be placed on the public record within 30 days from the date of the Commission's notification, this could occur at any time following certification of the Commission's vote.

¹ On September 1, 2014, the Federal Election Campaign Act of 1971, as amended ("the Act"), was transferred from Title 2 of the United States Code to new Title 52 of the United States Code.

**Ann M. Ravel
Chair**



FEDERAL ELECTION COMMISSION
Washington DC 20463

THIS IS THE END OF ADMINISTRATIVE FINE CASE # 2815

DATE SCANNED 2/11/15

SCANNER NO. 2

SCAN OPERATOR SES